

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

IP- Enabled Services

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WC Docket No. 04-36

**COMMENTS OF
THE NATIONAL GRANGE**

May 24, 2004

The National Grange welcomes the opportunity to comment on the above-captioned Notice of Proposed Rulemaking (NPRM) regarding services and applications making use of Internet Protocol (IP), including but not limited to voice over Internet protocol (VOIP) services (collectively, “IP-enabled services”). The National Grange is this nation’s oldest general farm and rural public interest organization. Founded in 1867, the National Grange today has 300,000 members affiliated with 3000 local, county and state Grange chapters.

As a result of a democratic resolution writing process held annually, the National Grange supports legislation to promote an integrated telecommunications network to assure widely available, high quality telecommunications to all of the nation’s users at a reasonable cost. The National Grange also supports legislative efforts to prevent a company from switching a customer’s telephone service to a different company without the customers written authorization.

IP-enabled services offer exciting new possibilities for expanding the way we communicate, but only if everyone has affordable quality access to these services. The

Commission must continue to require all providers of voice services, regardless of the technology over which the service is delivered, to meet the social obligations and public interest goals that have been the hallmarks of our nation's telecommunications policy. In particular, the Commission must establish a regulatory framework that ensures that all providers of voice services, including those providing IP-enabled voice services, are subject to meeting the social obligations of universal service, disability access, public safety and consumer protections.

Carriers Should be Required to Meet Social Obligations, Regardless of Service Definition

The Commission must develop the necessary regulations for maintaining universal service, disability access, public safety, and consumer protections for IP-enabled services, while eliminating provisions that would unnecessarily burden their development.

Universal Service Should Apply to VOIP Services

As a service that is functionally equivalent to plain old telephone service, IP-enabled voice service providers (VOIP) must contribute to the universal service fund to ensure affordable access to telecommunications services for all Americans.

VOIP Services Should Meet the Obligations of Section 255

Section 255 of the Telecommunications Act mandates that telecommunications services be accessible and usable for people with disabilities. These provisions must equally apply to VOIP. VOIP carriers must also meet equivalent obligations as other voice telecommunications carriers to contribute to funding the Telecommunications Relay Service (TRS) to ensure accessible telecommunications service for people with hearing and speech disabilities.

VOIP Providers Should Meet Public Safety Requirements

The Commission must also ensure that VOIP providers are subject to the same requirement to provide E-911 services to customers as are other telecommunications providers.

FCC Should Require VOIP Providers to Meet Consumer Protection Obligations

Consumers have expectations that VOIP services are fundamentally equivalent to telephony services. Regardless of the classification of voice IP-enabled services, the Commission must ensure that all providers of voice telephony, including VOIP carriers, provide the basic consumer protections that are currently being offered by voice service providers. These include, but are not limited to, licensing, slamming and cramming, privacy, advance notification of change in or termination of service, and other obligations.

As telecommunications evolves in the broadband world, we urge your support for public policies that ensure that all Americans reap the benefits from these new technologies by protecting programs that ensure universal service, access for people with disabilities, public safety, and other consumer protections.

Sincerely,

Leroy Watson, Legislative Director
National Grange of the Order of Patrons of Husbandry